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United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	2:16-cr-00114-JAD-GWF
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	RESPONSE DEADLINE TO
vs.)	DEFENDANT'S MOTION IN LIMINE TO
)	PRECLUDE TESTIMONY OF
RAMSEY HILL,)	GOVERNMENT WITNESSES
)	[Dkt. #47]
Defendant.)	
)	(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United States of America, and Rebecca Levy, AFPD, counsel for Defendant RAMSEY HILL, that the deadline for Government's Response to Defendant's Motion In Limine To Preclude Testimony Of Government Witnesses (Dkt. #47), currently due on February 3, 2017, be continued for an additional two (2) weeks.

1 This stipulation is entered for the following reasons:

2 1. Counsel for the Government needs additional time to research and prepare a
3 response to the Defendant's Motion.

4 2. The parties agree to the continuance.

5 3. The Defendant is incarcerated, but he does not object to a brief continuance of the
6 Government's response deadline.

7 4. Additionally, denial of this request for continuance could result in a miscarriage of
8 justice.

9 5. The jury trial in this aforementioned case is currently scheduled for May 23, 2017.

10 6. The additional time requested by this Stipulation is excludable in computing the
11 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
12 United States Code, Section 3161(h)(1)(D) and 3161(h)(7) and Title 18, United States Code,
13 Section 3161(h)(7)(A) and (h)(3)(A), when considering the facts under Title 18, United States
14 Code, Sections 3161(h)(7)(B), 3161(h)(7)(B)(i), and 3161(h)(7)(B)(iv), but should not impact the
15 trial setting which is currently set for February 7, 2017.

16 7. This is the second request for a continuance filed herein.

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19 /s/
ALEXANDRA MICHAEL
Assistant United States Attorney
20 Counsel for the United States

/s/
REBECCA LEVY
Counsel for Defendant RAMSEY HILL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	2:16-cr-00114-JAD-GWF
)	
Plaintiff,)	ORDER TO CONTINUE THE
)	RESPONSE DEADLINE TO
vs.)	DEFENDANT'S MOTION IN LIMINE TO
)	PRECLUDE TESTIMONY OF
RAMSEY HILL,)	GOVERNMENT WITNESSES
)	[Dkt. #47]
Defendant.)	
)	(<i>Second Request</i>)

This stipulation is entered for the following reasons:

1. Counsel for the Government needs additional time to research and prepare a response to the Defendant's Motion.

2. The parties agree to the continuance.

3. The Defendant is incarcerated, but he does not object to a brief continuance of the Government's response deadline.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The jury trial in this aforementioned case is currently scheduled for May 23, 2017.

6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(1)(D) and 3161(h)(7) and Title 18, United States Code, Section 3161(h)(7)(A) and (h)(3)(A), when considering the facts under Title 18, United States Code, Sections 3161(h)(7)(B), 3161(h)(7)(B)(i), and 3161(h)(7)(B)(iv), but should not impact the trial setting which is currently set for February 7, 2017.

7. This is the second request for a continuance filed herein.

ORDER

IT IS ORDERED that the Government's deadline to respond to the Defendant's motion in limine to preclude testimony of government witnesses scheduled for February 3, 2017, be vacated and continued to February 17, 2017.

DATED this 3rd day of February, 2017.


UNITED STATES MAGISTRATE JUDGE